



June 19, 2012

Mr. Nathan Dadap
United States Environmental Protection Agency Region IX
RCRA Facilities Management (WST-4)
75 Hawthorne Street
San Francisco, California 94105

**Re: Amendment #10 to the November 18, 2011 Application and Soil Management Plan
Additional Soil Sampling Plan for the Southwestern Golf Course, June 2012
Birch Hills Golf Course
2250 East Birch Street, Brea, California**

Dear Mr. Dadap:

On behalf of Chevron Land and Development Company (Chevron), URS Corporation (URS) is submitting Amendment #10 to the November 18, 2011 Application and Soil Management Plan for the poly-chlorinated biphenyls (PCBs) detected on the Birch Hills Golf Course located in Brea, California (Site – Figures 1 and 2). This amendment is being submitted to Region IX of the United States Environmental Protection Agency (EPA) in accordance with 40 Code of Federal Regulations (CFR) Part 761.61(c) and to the Orange County Health Care Agency, which provides oversight for remedial activities at the Golf Course.

Amendment #10 replaces Section 1.4.5.6 of the November 18, 2011 Soil Management Plan, "Data Sufficiency for PCBs, Arsenic, Nitrate, and Other Metals". This letter provides a revised plan for additional soil sample collection in the southwestern portion of the golf course based on discussions with EPA and OCHCA since the Soil Management Plan was submitted. This letter is being submitted to EPA and OCHCA for review and approval.

The sampling program will include placing 304 proposed borings in the center of the 50-foot by 50-foot grids shown on the southwestern portion of the golf course, if an existing boring is not already within that grid (Figure 2). Each boring will be advanced to 2 feet below ground surface (ft bgs) using a roto-hammer, hand auger or direct-push drilling rig to drive a sampling device containing a 2-foot long acetate sleeve to collect a continuous soil sample for laboratory analysis. After reaching the desired depth, the sampling device will be retrieved and the acetate sleeve will be split in half providing samples from 0 to 1 foot bgs and from 1 to 2-feet bgs. The sample sleeve ends will be covered with Teflon tape and a plastic end cap; labeled with the sample date, location and depth; and placed in a container for shipment to an off-site laboratory. The borehole will then be backfilled with bentonite chips hydrated in lifts in place, and then covered by the grass plug removed at the start of the process. The entire soil core will be used by the laboratory, so boring logs will not be prepared for these borings. Otherwise, soil collection and soil handling procedures will be consistent with Section 3.5 of the November 18, 2011 Soil Management Plan.

URS Corporation
2020 East First Street, Suite 400
Santa Ana, CA 92705-4032
Tel: 714.835.6886
Fax: 714.667.7147
www.urscorp.com

Each sample will be consolidated at the off-site laboratory per the discussion with the EPA, and then a sample aliquot will be taken for analysis as noted below. All samples will be analyzed for PCBs following EPA Method 8082. Additional aliquots for PCB analysis will be taken from ten percent of the samples for quality control/quality assurance purposes as duplicates (Section 3.6 of the November 18, 2011 Soil Management Plan). Five percent of the samples will also be analyzed by for total petroleum hydrocarbons by EPA Method 8015M, volatile organic compounds by EPA Method 8260B, total metals by EPA Method 6020/7471A, and dioxins/furans by EPA Method 8290 in accordance with the analytical program proposed in Section 3.5.2 of the November 18, 2011 Soil Management Plan.

Results will be reported in a follow-on amendment to the November 18, 2011 Soil Management Plan, which will present the data and a statistical/risk analysis of these data combined with the remaining southwestern data set.

If you have any questions/comments please feel free to contact Jim Martinez at (714) 319-2257 or Jerome Zimmerle at (714) 433-7738.

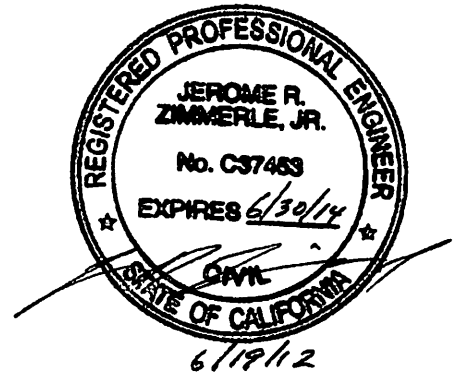
Sincerely,
URS Corporation



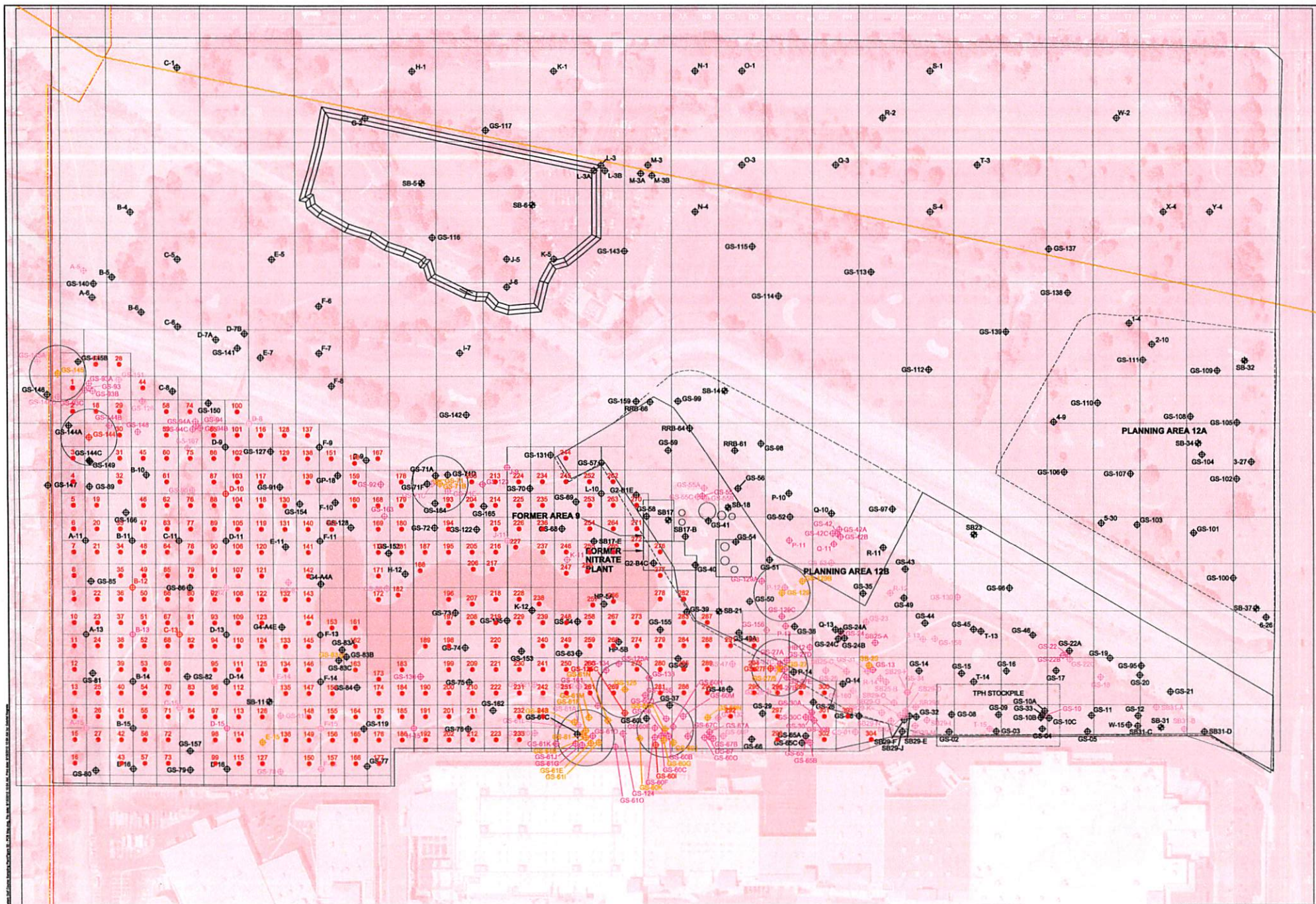
Jerome R. Zimmerle Jr., PE
Principal Engineer
California Professional Engineer No. C37453

cc: Jim Martinez (Chevron)
Trevor Black (Chevron)
Carmen Santos (EPA)

Garrick Jauregui (Chevron)
Steve Speer (OCHCA)



FIGURES



EXPLANATION

PLANNING AREA BOUNDARIES

PCB LOCATIONS AND CONCENTRATIONS:

- >25 PPM
- >5 - 25 PPM
- 0.5 - 5 PPM
- 0.22 - 0.5 PPM
- Non-detect - 0.22 PPM

- SOIL BORINGS
- 1993 HISTORICAL SOIL BORINGS
- 2006 HISTORICAL SOIL BORINGS
- CURRENT SOIL BORINGS

URS

SITE PLAN
AND SOIL SAMPLING LOCATIONS

Project: 2006000000 Date: JUNE 2012
Prepared: CRYSTIAN BROWN/URS
Scale: 1" = 100' Map: 2